



# COLORADO

## Air Pollution Control Division

Department of Public Health & Environment

### Landfill Rule Change FAQ

October 2016

Municipal Solid Waste (MSW) landfills are currently subject to Emission Guideline (EG) Cc or New Source Performance Standard (NSPS) Subpart WWW. In August, EPA released updated landfill rules under EG Cf and NSPS XXX. The Federal Register lists an effective date for these new standards of October 28, 2016. **The Division anticipates the new rules will be adopted and effective in Colorado by Summer/Fall 2017.**

**NSPS XXX:** This rule will be federally enforceable beginning on October 28, 2016. Colorado's Air Pollution Control Division (Division) will *not* be the administrator of this rule until it is adopted into Regulation 6 by the Colorado Air Quality Control Commission (AQCC).

**EG Cf:** This rule will not be enforceable by the Division or the EPA until the emission guidelines are incorporated into a state plan that EPA approves.

#### What do I need to do right now?

Continue to comply with the requirements of EG Cc or NSPS Subpart WWW, including NMOC reporting and well monitoring and reporting.

#### Which rule will I be subject to?

Most Colorado landfills will be subject to EG Cf initially. New or reconstructed landfills, and modified landfills that increase their design capacity, after July 17, 2014 will be subject to NSPS Subpart XXX.

#### If I am subject to NSPS XXX, when do I need to comply?

NSPS Subpart XXX is federally enforceable starting October 28, 2016. However, it will not be state enforceable until the AQCC adopts it. The Division anticipates adoption by Summer 2017. Please contact the Division with specific implementation questions.

***The remainder of this document is for landfills that will be subject to EG Cf.*** If you have specific questions you may contact the Division:

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#### If I am subject to EG Cf, when do I need to comply?

Continue to comply with EG Cc or NSPS Subpart WWW until the state plan is adopted by the AQCC (anticipated by ~July 2017) and approved by EPA (anticipated by ~November 2017).

**How will I know when the state plan is approved?**

When EPA approves the state plan, information will be published in 40 CFR 62 Subpart G. The Division will also post the date on the website and send emails through the Air Mailing List notifying sources.

**How do I join the mailing list?**

Fill out the form at <https://www.colorado.gov/pacific/cdphe/air-mailing-lists>; select General Air Division Updates.

**Will I need to submit a new design capacity report?**

Existing sources will need to submit a new design capacity report within 90 days of the approval date of the state plan.

**I have a landfill smaller than 2.5 million megagrams and/or 2.5 million cubic meters. Will I have to submit an NMOC report?**

No.

**I have a landfill with a required Gas Collection and Control System (GCCS). Will I have to submit a new Non Methane Organic Compound (NMOC) emission report?**

No.

**I have a landfill with a design capacity larger than 2.5 million megagrams and 2.5 million cubic meters and do not operate a required GCCS. Will I have to submit a new NMOC report?**

Yes, you will be required to submit a new NMOC report within 90 days of the approval date of the state plan.

**When can I start utilizing Tier 4 testing for compliance purposes?**

You can test your landfill whenever you'd like. However, the Division cannot accept Tier 4 results for compliance purposes until EPA approves our state plan. Once EPA approves the plan, protocols will be required 60 days prior to testing, and all testing must comply with the Division's compliance test manual.